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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 20-cv-08570-JD

The Hon. James Donato

CIVIL ACTION

**DECLARATION OF KRISTEN M.
ANDERSON REGARDING
COMPLIANCE WITH DKT. NO. 301**

1 Pursuant to 28 U.S.C. §1746, I, Kristen M. Anderson, declare:

2 1. I am a partner at Scott+Scott Attorneys at Law LLP and am licensed in the State of
3 California and admitted to the United States District Court for the Northern District of California.
4 I have personal knowledge of the facts set forth herein and, if called as a witness, could and would
5 testify competently to them.

6 2. On March 18, 2022, the Court appointed Yavar Bathaee of Bathaee Dunne LLP
7 and me as Interim Class Counsel for the Advertiser Class in the above-captioned matter. Dkt. No.
8 43.

9 3. On April 21, 2022, Advertiser Plaintiffs moved to compel Defendant Meta
10 Platforms Inc. (“Meta”) to produce all presentation and related documents Meta provided to the
11 Federal Trade Commission (“FTC”). Dkt. No. 281.

12 4. On May 13, 2022, Meta opposed Meta’s motion to compel. Dkt. No. 296.

13 5. On May 23, 2022, the Court ordered lead counsel for the parties to meet and confer
14 on a resolution of the issues briefed in Dkt Nos. 281 and 296, as well as Dkt. Nos. 294, 296, 297,
15 and 298 relating to motions to compel filed by Consumer Plaintiffs. Dkt. No. 301. Further, the
16 Court ordered that the meet and confer be held in person unless lead counsel are more than 100
17 miles apart, in which case a video access platform may be used, and that the conference shall be
18 held for a minimum of four hours and may be terminated earlier only if all disagreements have
19 been resolved. *Id.* This declaration is made pursuant to the Court’s Order at Dkt. No. 301 requiring
20 lead counsel for each of the parties to certify compliance with that Order.

21 6. On May 27, 2022, lead counsel for the parties met and conferred regarding these
22 discovery disputes from 11:00 a.m. until 4 p.m. EST. Mr. Bathaee and I met with David Gringer,
23 counsel for Meta, in person at the New York, New York office of Wilmer Cutler Pickering Hale and
24 Door, LLP. Other lead counsel, including Stephen A. Swedlow of Quinn Emanuel Urquhart &
25 Sullivan LLP, Shana A. Scarlett of Hagens Berman Sobol Shapiro LLP, and Sonal Mehta of Wilmer
26 Cutler Pickering Hale and Door, LLP, all located more than 100 miles outside of New York, New
27 York, participated in the meet and confer via video access platform.

1 7. During the meet and confer, Meta and Advertiser Plaintiffs reached a resolution
2 regarding Meta's production of FTC presentations, which the parties subsequently confirmed in
3 email correspondence on June 6, 2022.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Dated: June 17, 2022

s/ Kristen M. Anderson
KRISTEN M. ANDERSON

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List. All parties not so registered will be served via e-mail or U.S. Mail.

Executed on June 17, 2022, at New York, New York.

s/ Kristen M. Anderson
KRISTEN M. ANDERSON (CA 246108)